

February 15, 2008

Mr. Adolph Everett  
US EPA Region 2  
290 Broadway, Floor 22  
New York, NY 10007-1866

**Re: Chevron Corporation  
Perth Amboy, Middlesex County, New Jersey  
EPA ID# NJD081982902  
USEPA Comment Letter on Full RFI Report dated January 21, 2005**

Dear Mr. Everett:

Enclosed please find Chevron's response to the above-referenced comments on the November 2003 Full RFI Report and results from the Supplemental RFI (SRFI) Investigation. Since the Full RFI Report was submitted, the following are several other relevant environmental activities that have transpired at the Chevron Perth Amboy, New Jersey site.

- The RCRA Closure Project, which began in the late 1980's, is essentially complete;
- The AOC 36 Investigation was conducted in 2004 and completed in 2006;
- The West Yard was sold in 2004 and redeveloped by the City of Perth Amboy's Redevelopment Project, which required environmental investigations and remediation under State oversight;
- Amboy Field was sold in November 2005 and is currently being redeveloped, which required environmental investigations and remediation under State oversight;
- Various SWMUs and AOCs are undergoing interim stabilization measures (subsurface product recovery) under the LNAPL Project pursuant to the HSWA permit;
- The SRFI Investigation was conducted in 2006 and 2007;
- The Corrective Measures Study (CMS) Pre-Design Investigation (PDI) was conducted in 2006 and 2007;
- The ongoing Potential Area of Concern (PAOC) Investigation Project which began in 2002 has generated additional soil and groundwater quality data; and
- Chevron has separately investigated the North Field Extension as part of a litigation matter and is currently seeking a settlement to sell portions of the parcel.

As a result of the above work, the volume of environmental information has significantly increased. Each of these projects pertains to an investigation conducted at one or more AOCs and/or SWMUs; however, the attached SRFI Report is focused primarily on those areas addressed in the 2003 Full RFI Report. Information from various other investigations and initiatives was intended to be included in this submittal, but was

delayed due in part to ongoing data analysis of the current SRFI findings to be completed at the end of the first quarter of 2008. This additional information is being completed as follows:

- A formal update on the status of thirteen new AOCs (AOC 37 through AOC 49) reported to EPA on February 26, 2007 will be submitted to EPA and NJDEP following Chevron's internal review. This information will be combined with the results of additional field investigations currently underway at AOC 31 – Tank Basin 772 Pump Pad, SWMU 32 – TBA Warehouse PCB Waste Storage Area, and SWMU 51 – Oily Soil Pad. The update will include post-RFI and SRFI data results.
- Chevron is currently developing a geologic model of the Perth Amboy site to support further environmental activities on-site. The geologic data set currently requires additional refinement to be accurate. Chevron expects to complete this model in early 2008.
- A Supplemental PAOC Report will be submitted to EPA and NJDEP following Chevron's internal review. Eight PAOC investigations are ongoing and are to be completed this quarter.
- Findings from the CMS PDI will be submitted to EPA and NJDEP following Chevron's review.

To date, over 90% of the field work needed to satisfy the RFI requirements of Chevron's HSWA Permit has been completed. In addition, Chevron is awaiting EPA's determination of various units for which an NFA has been requested. To aid in this ongoing effort, Chevron has developed a Unit Tracking Table that illustrates the status of each unit covered under the HSWA Permit (see attached Table 1). In addition, the table separately tracks the PAOCs, Oily Water Sewer System (AOC 16) subareas, and LNAPL Areas. As we move forward, this table will be an important tool for use in the decision-making process, as well as effectively communicating our remedial status.

If you have any concerns, please contact me at (732) 738-2023.

Sincerely,

Robert E. Mancini  
RBU Project Manager

Attachments

cc: Mr. Barry Tornick, USEPA Region 2  
Mr. Sin-Kie Tjho, USEPA Region 2  
Mr. Anthony Cinque, NJDEP (3 copies)  
R. Lavorerio

bcc: K. Siet, TRC Raviv  
M. Bolen, SAIC  
J. Vorbach, URS  
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